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8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10
11 STEPHEN MASSA,

12 Plaintiff

13 vs.

14 FORD MOTOR COMPANY; and DOES 1 to
15 10,

16 Defendants

Case No.: 3:22-cv-00243-ART-CLB

**Stipulation and Proposed Order to Extend
Time to File Joint Case Management Report
(First Request)**

17 Plaintiff Stephen Massa and defendant Ford Motor Company, through their counsel of
18 record, for good cause shown, stipulate to extend the parties' deadline to file their joint case
19 management report to August 1, 2022, for the following reasons:

20 1. On January 12, 2022, Massa filed his complaint against Ford in the Superior Court
21 of the State of California for the County of San Diego, North County.¹

22 2. Ford removed the action to the United States District Court for the Southern District
23 of California on March 11, 2022.²

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27 ¹ ECF No. 1-3 (complaint).

28 ² ECF No. 1 (notice of removal).

3. Massa amended his complaint on April 15, 2022,³ which Ford answered on April 29, 2022.⁴

4. The same day, the parties jointly moved to change venue to the District of Nevada.⁵

5. Judge Anthony J. Battaglia of the Southern District of California granted the transfer motion and transferred this action to the District of Nevada on May 19, 2022.⁶

6. On June 2, 2022, this Court ordered the parties to file their joint case management report.⁷

7. The parties both recently retained counsel in Nevada.

8. Newly retained counsel requires additional time to review the relevant documents to meaningfully meet and confer, and to adequately inform this court about the items required by this Court's order to file the joint case management report.

9. The parties agreed to this extension.

10. The extension request is sought in good faith and is not made for the purpose of delay.

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³ ECF No. 8 (amended complaint).

⁴ ECF No. 11 (answer).

⁵ ECF No. 9 (joint motion).

⁶ ECF No. 13 (order granting joint motion).

⁷ ECF No. 17 (order to file case management report).

1 Therefore, the parties respectfully request an extension to file their joint case management
2 report in this matter up to and including August 1, 2022.

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4 Dated: June 30, 2022

Dated: June 30, 2022

5
6 CLINE APC

SNELL & WILMER L.L.P.

7 By: /s/ Brian Cline

By: /s/ Dawn Davis

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10 *Attorneys for Plaintiff*

Attorneys for Ford Motor Company

11
12 **ORDER**

13 Good cause appearing, **IT IS HEREBY ORDERED** that the parties shall file their joint
14 case management report on or before August 1, 2022.

15 **IT IS SO ORDERED.**

16 
17 UNITED STATES MAGISTRATE JUDGE

18 DATED: July 1, 2022
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CERTIFICATE OF SERVICE

I hereby certify that on June 30, 2022 I electronically transmitted the foregoing document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to all counsel in this matter; all counsel being registered to receive Electronic Filing.

/s/ Lyndsey Luxford
An employee of SNELL & WILMER L.L.P.

4892-9769-0151